

**In The Matter Of:**

*W.K., et al v.*

*Red Roof Inns, et al*

**PL Sum. J.**

**Ex. 015**

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*Vanessa Cole*

*October 18, 2021*

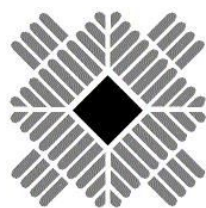
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Associates, Inc.**

Min-U-Script® with Word Index

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., )  
M.B., D.P., A.F., C.A., )  
R.K., K.P. and T.H., )  
)  
Plaintiffs, ) CIVIL ACTION FILE  
)  
vs. ) NO. 1:20-cv-5263-MHC  
)

RED ROOF INNS, INC., FMW )  
RRI NC, LLC, RED ROOF )  
FRANCHISING, LLC, RRI WEST )  
MANAGEMENT, LLC, VARAHI )  
HOTEL, LLC, WESTMONT )  
HOSPITALITY GROUP, INC., )  
and RRI III, LLC, )  
)  
Defendants. )

\_\_\_\_\_  
J.A., )  
)  
Plaintiffs, ) CIVIL ACTION FILE  
)  
vs. ) NO. 1:21-cv-03655-TWT  
)  
RED ROOF INNS., INC., RED )  
ROOF FRANCHISING, LLC and )  
VARAHI HOTEL, LLC, )  
)  
Defendants. )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF VANESSA COLE  
October 18, 2021

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JANE DOE 1, JANE DOE 2, )  
JANE DOE 3 and JANE DOE 4, )

Plaintiffs, )

vs. )

WESTMONT HOSPITALITY )  
GROUP, INC., RED ROOF INNS, )  
INC.; FMW RRI NC, LLC, RED )  
ROOF FRANCHISING, LLC, RRI )  
WEST MANAGEMENT, LLC and )  
VARAHI HOTEL, LLC and RRI )  
III, LLC, )

Defendants. )

E.F., )

Plaintiff, )

vs. )

RED ROOF INNS., INC., RED )  
ROOF FRANCHISING, LLC, HJA )  
ENTERPRISES, INC., and SAI )  
NATIONAL HOSPITALITY )  
VENTURES, LLC, )

Defendants. )

CIVIL ACTION FILE

NO. 1:21-cv-04278-WMR

CIVIL ACTION FILE

NO. 1:20-CV-04373-SDG

VIDEOTAPED DEPOSITION OF VANESSA COLE

October 22, 2021

1  
2  
3  
4  
5  
6  
7 Videotaped deposition of VANESSA COLE,  
8 taken on behalf of the Plaintiffs, pursuant to the  
9 stipulations contained herein, signature being  
10 reserved, in accordance with the Federal Rules of  
11 Civil Procedure, before Kelly D'Amico, RPR, Certified  
12 Court Reporter and Notary Public, at 1201 West  
13 Peachtree Street, Suite 3900, Atlanta, Georgia, on the  
14 18th day of October, 2021, commencing at 1:13 p.m.  
15  
16  
17  
18  
19

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A P P E A R A N C E S

On behalf of Plaintiffs W.K., E.H., M.M., R.P., M.B.,  
D.P., A.F., C.A., R.K., K.P. and T.H.; Plaintiff J.A.;  
Plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane  
Doe 4; and Plaintiff E.F.:

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Videographer:

Eric Lucas

Also present:

Alexis Digorgio (via videoconference)  
Michael Weinstein (via videoconference)  
Samantha Girschick (via videoconference)

- - -

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1 can be in one room while someone is in another and  
2 there's activity going in and out of those rooms.

3 Q And did you observe what you believed to  
4 be sex trafficking at this hotel?

5 A Yes.

6 Q All right. And please explain or  
7 describe what might have made you believe that was sex  
8 trafficking.

9 A We had one car that had about five people  
10 in the back seat or in the car and the lady came in  
11 and was rushing me to check her in and paid cash and  
12 wanted to hurry up and kept looking back towards the  
13 car. And they were in -- they went into their room.  
14 I called Cobb County Police Department. They came out  
15 and they determined that there was trafficking.

16 Q All right. And so based on, I think you  
17 said, the large problem of crime and sex trafficking,  
18 what was it that you tried to do?

19 A Anytime I saw any kind of activity I  
20 would always be around. If I saw people hanging out  
21 in cars loitering, I would approach the vehicle, and  
22 that's how I found out Cobb County was watching the  
23 hotel. I would have my housekeeping, my front desk,  
24 also the maintenance department looking out to see  
25 what kind of activity was happening on the property.

25



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1 Q And what was his position about revenue  
2 going down when you were trying to clean it up?

3 A He was -- well, his response was, yes, we  
4 understand we have to, you know, clean up the place,  
5 but we also need to sell rooms.

6 Q And did he prioritize one over the other,  
7 revenue over safety?

8 A In speaking with him, it seemed like he  
9 was prioritizing the revenue to meet budget.

10 Q All right. I want to go back and you had  
11 indicated that you had also worked at the North Druid  
12 Hills, Buckhead area. I think that's 1960 North Druid  
13 Hills, Atlanta, Georgia; is that correct?

14 A Yes.

15 Q And tell me, when did you work there?

16 A I did some training there when I first  
17 came in in 2009 and then I helped, you know, when a  
18 general manager was absent or went on vacation in  
19 between managers.

20 Q And I think you said 2009. How -- was it  
21 just that year, was it multiple years, or how often  
22 did you go back?

23 A It was multiple years when I didn't have  
24 to be out of state. So in order -- for instance, if  
25 there's not a hotel that needs a general manager at

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1 the time, since I lived in Marietta, Georgia, they  
2 would assign me to go help out at a different hotel.

3 Q Okay. And just ballpark how many times  
4 do you think you worked at the North Druid Hills?

5 A I maybe helped them, oh, off and on.  
6 Total I -- probably like two months.

7 Q Okay. And what year span would that have  
8 been?

9 A That would have been 2009 during my time  
10 at the Smyrna property between 2011 and 2012. After  
11 that I went to the Kennesaw property in 2000- -- late  
12 2012, 2013. So I would drive to the Druid Hills  
13 location.

14 Q And what was your duties or  
15 responsibilities when you were there?

16 A Room inspections, making sure the  
17 housekeepers get what they had -- or what they needed,  
18 making sure that the front desk is adhering to  
19 policies and procedures.

20 Q So you were a general manager there too  
21 as well?

22 A Right.

23 Q Just for short periods of time?

24 A Right.

25 Q And did they have cameras there?

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1           A           I would send it to -- Christine Taylor is  
2 her last name.

3           Q           Okay.

4           A           And -- Christine Taylor and copy Jay  
5 Moyer because Jay Moyer wanted to be copied on  
6 everything we send.

7           Q           For both this one and the Smyrna?

8           A           Yes.

9           Q           Did this property have a security  
10 company?

11          A           It did, but I'm not sure if it kept going  
12 the entire time.

13          Q           Okay. And what was your general  
14 impression or paint a picture of what crime was like  
15 when you were there at this hotel?

16          A           There was at least one incident each week  
17 that I was there. And when I say an incident, it's,  
18 you know, somebody was in a fight, somebody was  
19 arrested, somebody was -- created damage, somebody  
20 stole something, you know, took furniture, whatnot.

21          Q           And did you observe prostitution at this  
22 hotel?

23          A           Yes.

24          Q           And again, would you consider this a  
25 small or a large problem?

30

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1           A           It was pretty consistent there. I mean,  
2 we had one that was arrested and they left the gun  
3 behind, so I had to get the gun and turn it in to  
4 DeKalb County Police Department.

5           Q           And how about signs of sex trafficking at  
6 this hotel?

7           A           I can't confirm that it was sex  
8 trafficking, but you see the signs.

9           Q           Okay. And again, did you -- when you  
10 were there did you try to do things to curtail it?

11          A           Yes.

12          Q           And how was that met by corporate?

13          A           I never really got a response since I  
14 wasn't their direct general manager. So therefore, I  
15 never got a response to anything that I did.

16          Q           And when did you leave Red Roof?

17          A           January 25th of 2016.

18          Q           And why did you leave?

19          A           I got to the point where I had to travel  
20 three weeks on. I was only able to come home five  
21 days a week. So if my time ended on -- for instance,  
22 if -- you know, I couldn't come home for Thanksgiving  
23 because I had to be out for three weeks or I couldn't  
24 come home for Christmas because I was out for three  
25 weeks. And it was one that I was always having to

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1 would talk to me if something happened, you know, from  
2 that review, for instance, somebody complained. He  
3 would follow up on that. But I was the one that was  
4 responsible for responding back to them and he would  
5 see the response.

6 Q Okay. And was there a matrix or anything  
7 that kind of collated these reviews?

8 A Yes. We had rankings. So part of the  
9 rankings were your reviews, your surveys, your  
10 reven- -- your RevPAR. It was also with other matrix,  
11 for instance, if you were short or if you had to give  
12 refunds back to people. So refunds counted against  
13 you if you ever had to give a refund back to people.  
14 A report came out every month, I believe, with any  
15 refunds that you may have given back to people and  
16 telling you why you -- you had to explain why you gave  
17 a refund back.

18 Q Okay. And you mentioned prostitution was  
19 a large problem at this hotel. So as a general  
20 manager, I mean, you witnessed prostitution and you  
21 had prostitutes arrested?

22 A Yes.

23 Q All right. And when that was done, then  
24 you then reported that information up the chain to Red  
25 Roof corporate?

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1 A Yes.

2 Q Jay Moyer and others?

3 A Yes.

4 Q Okay. And you talked about sex  
5 trafficking at this hotel so I just want to go back  
6 and make sure I understand. Traffic can be kind of a  
7 general term.

8 When you said you saw high traffic, were  
9 you saying you saw a lot of men going in and out of  
10 one room like repeatedly as one of the signs of sex  
11 trafficking you saw?

12 A Yes. I have also seen girls, for  
13 instance, being dropped off in a taxi or, you know,  
14 they came in from the Greyhound from other areas and  
15 were checked into a room.

16 Q And were these young girls or --

17 A Yes, they were all young girls.

18 Q Like?

19 A They were maybe 16, 17, 18 years old.

20 Q Who were checking these minors into the  
21 hotel?

22 A Yeah, they always had an adult with them,  
23 one single adult.

24 Q All right. And why did you think --  
25 instead of it being like a parent, why would you think

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1 that might have been sex trafficking?

2 A Because they were not allowed to speak to  
3 us. They were not allowed to look at us or engage  
4 with us. So it was one of those things that even the  
5 person that was checking them in wasn't looking at  
6 them. A lot of them -- I'd say the majority of them,  
7 I can't say 100 percent, but they all paid cash.

8 Q And were there other signs? Like did  
9 they request lots of towels for those rooms --

10 A Yes.

11 Q -- with high traffic?

12 And cleaning people, they'd find condoms  
13 and other --

14 MR. ALLUSHI: Objection, leading.

15 BY MR. McDONOUGH:

16 Q What other signs of sex trafficking did  
17 you see at the hotel?

18 A We saw costumes, we saw wigs, we saw a  
19 lot of condom packages, we saw candles burning, we saw  
20 changing of the lightbulbs for a different color, we  
21 saw things hanging from the lamps. You know, there's  
22 different signs that they, you know, hang. I'm not  
23 sure. It's not a scarf or something but something  
24 over the lamps. So sometimes there's incense burning.  
25 And then you see the dirty linen afterwards. They

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1 always request linen changes or extra linen for their  
2 rooms.

3 Q And did you observe what you considered  
4 to be the pimps along with these minors?

5 A Yes.

6 Q And just how would you describe that or  
7 why did you think they were pimps?

8 A For the most part, you know, it was one  
9 individual and it could be somebody else waiting in a  
10 vehicle for them and then they were directed, the car,  
11 where to go with these people following behind them.  
12 Sometimes they didn't want to talk so they had  
13 somebody do the talking for them. It was -- they were  
14 keeping a low profile.

15 But again, sometimes they had two rooms  
16 or, you know, one would stay in one room, the others  
17 would stay in the other room and that had a lot of  
18 activity, or they would rent out one room but the  
19 person stayed out in the car.

20 Q And I just want to understand. When you  
21 say a lot of activity, that's adult men going in and  
22 out of the rooms like in short order?

23 A Yes.

24 Q Okay. And I think we talked about it  
25 earlier, but I just want to make sure I understand.

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C E R T I F I C A T E

I hereby certify that the foregoing transcript was reported, as stated in the caption; that the witness was duly sworn and elected to waive signature in this matter; that the colloquies, questions and answers were reduced to writing under my direction; and that the foregoing pages 1 through 161 represent a true, correct, and complete record of the evidence given.

I further certify that I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c); that I am a Georgia Certified Court Reporter here as a representative of D'Amico & Associates; that I/D'Amico & Associates was contacted by the party taking the deposition to provide court reporting services for this deposition; that I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 10.B of the Rules and Regulations of the Board; and by the attached disclosure forms I confirm that I/D'Amico & Associates is not a party to a contract prohibited by O.C.G.A. 15-14-37 (a) or (b).

The above certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of D'Amico & Associates and the signature and original seal is attached thereto.

This, the 5th day of November, 2021.



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KELLY D'AMICO, RPR, CCR-B-1322